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Via FedEx Overnight and Email

March 22, 2018

Mr. David Rosoff, On-Scene Coordinator
U.S. Environmental Protection Agency, Region II
Removal Action Branch
2890 Woodbridge Avenue
Edison, New Jersey 08837
rosoff.david@epa.gov

Re: Draft Anchor QEA Building Assessment Summary Report
Vo-Toys Site, Harrison, NJ

Dear Mr. Rosoff:

As you know, together with Chiesa Shahinian & Giantomasi PC, we represent BRG Harrison Lofts Urban Renewal LLC (BRG). Our client has received and reviewed the draft January 2019 Building Assessment Summary Report (BASR) prepared by Anchor QEA (AQEA) on behalf of the General Electric Company (GE). BRG's consultant, Gradient, has prepared the enclosed technical comments identifying a number of serious deficiencies with the draft BASR. For the reasons cited by Gradient and discussed herein, BRG respectfully requests that EPA consider the enclosed comments in its review of the draft January 2019 BASR and, prior to accepting the document as final, direct AQEA to revise the draft accordingly.

As you know, this is not an unusual request, as providing feedback and requesting revisions to ensure the final BASR is a factually-accurate document meeting the objectives of the EPA-approved scope of work for the building characterization is a typical component of EPA's oversight role at the Vo-Toys Site (the Site). Such a role is also consistent with EPA's practice in reviewing work product at Superfund cleanup sites.

GE Continuously Seeks to Understate its Responsibility for the Mercury Contamination

BRG does not object to AQEA's conclusion in the BASR that GE's mercury contamination throughout all three buildings at the Site has rendered all three buildings unfit for future occupancy for any purpose, thus constituting an ongoing threat to public health and the

environment. This is a conclusion that GE has probably known for years, based on its experience at Grand Street in Hoboken. However, as detailed below, GE continues to direct AQEA and its LSRP in their reporting, which results in misleading and inaccurate submissions designed to shift the blame from GE to others in an effort to avoid its responsibility and liability for the mercury contamination and its remediation – not dissimilar to the Hoboken matter, when GE blamed the Grand Street residents for their untenable situation.

Portions of the draft January 2019 BASR, as explained below, are outside of the EPA-approved scope of work, unrelated to remedy selection, and unsupported by either the historical record or by the data collected by AQEA. Revisions to address these misleading and unsubstantiated portions of the draft January 2019 BASR are necessary to preserve the integrity of the document and the investigation as a whole. However, the needed revisions do not undermine the basic conclusion that the buildings are damaged beyond repair by GE's severe mercury contamination throughout the site, so making the appropriate changes to the BASR would not delay EPA, GE and BRG's progress toward implementation of the remedy while the draft BASR is finalized.

BRG's chief concern with the draft January 2019 BASR is that AQEA went far beyond the scope of the characterization work plan to include 4 pages of erroneous speculation in a transparent effort to attribute the distribution of mercury on certain floors of the buildings to BRG's extremely limited pre-development work (for selective interior demolition that did not disturb process piping associated with GE's and RCA's manufacturing operations, lead paint stabilization and asbestos abatement) during its first few months of ownership – work that was done by BRG under GE's close supervision.

At the same time, the draft BASR (1) downplays the 70+ year history of GE's and RCA's operations at the site, and (2) minimizes GE's extensive work which materially modified conditions in the three buildings. This work included numerous floor cuttings, removal of entire portions of floors and drilling over a hundred borings through floor slabs and into underlying contaminated soils, which dwarfed the work by BRG. In addition, the removed floor sections and boring holes were left uncovered for numerous months by GE; these areas served as a direct conduit of mercury vapors from the soils into the buildings. Anchor disingenuously refers in the draft BASR to GE's work as having been undertaken by "others" – apparently attempting to distance GE from its own actions at the Site. GE's own contractors – hired and supervised by GE – are the "others."

AQEA was not tasked with, nor did it perform, a complete source investigation or a fate and transport analysis for mercury in the buildings. Instead, AQEA cherry-picked on-site activities to highlight in the draft BASR in a disingenuous attempt to persuade EPA to impose liability on BRG. In doing so, AQEA mis-characterized the scope and extent of BRG's pre-development activities at the Site (all of which were done in full coordination with GE environmental personnel), and intentionally omitted discussion of the far more intensive and extensive work conducted by GE or its contractors at the Site which may have mobilized mercury throughout the buildings.

Unfortunately, as is typical of GE's approach to its historic legacy contamination, the company would rather have third parties and the government undertake necessary remediation instead of owning up to its responsibilities, being a good corporate citizen, and using some of its $1.8 billion in environmental remediation reserves to pay for the work themselves.

EPA Should Strike the Misleading Section and Direct GE to Undertake Additional Activities Consistent with the Scope

Rather than convert this BASR into an expert report on fate and transport, BRG respectfully requests that Section 6 of the draft January 2019 BASR be stricken prior to EPA accepting the report as final. In the alternative (though not preferred), BRG requests the opportunity to provide line edits to Section 6 of the draft BASR to correct factual mis-statements and complete the record of on-site building activities. Without these modifications, the BASR is inaccurate and incomplete and misleading to the public.

In addition, Gradient identified a number of characterization-related activities that Anchor failed to complete, which would assist both EPA and NJDEP in developing a final remedy for the entire site. These activities, including the full investigation of process-related piping and process-related subsurface structures, are critical to understanding the potential geographical reach of contamination caused by GE and RCA's activities at the Site, and ensuring that the removal action is complete. This information might also assist EPA in its efforts to address the mercury contamination observed at neighboring properties. Please confirm that this work – both on-site and on the adjacent properties - is still pending and will be conducted either as part of the remedial design work, or on a separate track.[1]

Finally, BRG requests that the BASR be modified to address the questions raised by Gradient associated with AQEA's sampling methodologies, sampling information (boring logs, photographs, field notebooks, etc.) and inclusion of information from prior AQEA reports and historic documents.

Hardship on Town of Harrison and its Residents.

Finally, GE has caused a severe hardship on the Town of Harrison due to the severe mercury contamination of: (1) the soils under the 36 adjacent homes (RCA Facility Block), (2) the Vo-Toys buildings and site, and (3) the adjacent shopping center site to the west of the Vo-Toys site.

[1] During discovery in the litigation brought by BRG against GE and others, GE refused to provide documents related to GE's clean-up of past mercury-contaminated GE properties. This information could be helpful to the EPA (and NJDEP) in formulating the most efficacious remedial plan. Thus, we suggest that EPA request GE to provide such material.

Notwithstanding GE's feigned expressions of willingness to address its contamination, GE's actions reflect the complete opposite – a complete unwillingness to proceed forward on any basis unless compelled to do so by EPA.

In this regard, it is worth noting that after meeting with EPA, BRG and the Town of Harrison in April 2016 - during which meeting GE expressed its willingness to commence the characterization and to negotiate the Order of Consent - it took GE over two years to commence the building characterization study in May 2018, and almost three years to complete and release the flawed draft BASR in late January 2019.

Conclusion

If you have any questions for BRG or Gradient regarding these comments, please don't hesitate to contact me at the email or phone listed above (or my colleague Maggie Macdonald (646 378-7228 and mmacdonald@sprlaw.com). BRG is grateful to EPA for your efforts to get the Site investigated and remediated, and your attention to our concerns with the draft January 2019 BASR is similarly appreciated.

Sincerely,

Mark A. Chertok

Cc: Mayor Fife, Town of Harrison
Fred Mumford, NJDEP
Ira Gottleib, Esq.

Comments on Anchor QEA's Building Assessment Summary Report
Vo Toys Site, Harrison, NJ

March 22, 2019

Overview

On behalf of BRG Harrison Lofts Urban Renewal, LLC ("BRG"), this document presents Gradient's comments on the Building Assessment Summary Report ("BASR", AQEA, 2019) prepared by Anchor QEA. The BASR presents the results of the building assessment study conducted at the Vo-Toys Site located at 400 South Fifth Street, 420 South Fifth Street, and 530 Bergen Street (collectively the "Site"), in Harrison, New Jersey. Gradient had previously provided comments on the Anchor QEA's Building Assessment Work Plan ("Work Plan," AQEA, 2018) [Gradient, 2018a]; we also provided additional comments during the implementation of the study, when US EPA shared ambient air monitoring data collected at the Site (Gradient, 2018a).

The data collected as part of the BASR clearly demonstrates the presence of high levels of mercury in all three buildings. Elevated mercury was encountered in all building elements evaluated (*i.e*. floors, walls, columns, beams, windows; roof, see Tables 1 through 4) and across all tested media (*e.g*., indoor and outdoor air, building materials, building debris). Given the widespread presence of mercury in the buildings and the challenges of remediating mercury-affected buildings for beneficial reuse, Anchor QEA has appropriately concluded that all three buildings need to be demolished. Data collected as part of and during the BASR also demonstrate that:

- Pools and globules of elemental mercury are present in multiple locations in Buildings B and C. Elemental mercury was also confirmed to have fully penetrated the floor slab on the first floor in Building B (see attached, Figure 4-10 of the BASR) – information that is consistent with the widespread presence of elemental mercury that had previously been documented on the first floor of Building B (*e.g*. underneath sections of wood sub-flooring and within floor excavations);
- High concentrations of mercury were found in the first floor building floor materials (concrete, tar paper, cinder) in all three buildings (*e.g*., see attached, Figure 4-10 of the BASR);
- Some of the highest mercury vapor concentrations within the buildings were recorded in pipes (many exceeding the upper-bound measurement range of the MVA, *i.e*. >999 $\mu g/m^3$) – associated with GE-related legacy operations conducted at the Site – and a likely conduit for mercury migration into the subsurface; and
- Mercury emissions from the buildings are affecting ambient air quality near the buildings. Ambient air quality data collected over a six-month period by an US EPA contractor consistently detected mercury outdoor air concentrations exceeding US EPA's health-based benchmark for mercury (Gradient, 2018b).

The high mercury concentrations recorded in building materials and the presence of multiple pools of elemental mercury within the buildings are consistent with extensive handling and releases of mercury within the buildings during GE and RCA's historical operations at the Site. Given the widespread presence of mercury in the buildings, it is not surprising that mercury from the buildings has been and continues to be discharged to the environment. Mercury has been found at concentrations exceeding NJDEP's residential direct contact and/or impact to groundwater standards in subsurface soil samples obtained from the following areas at the Site:

- **Below the slabs in all three buildings:** Exceedance of NJDEP's mercury soil standards were noted in soil samples obtained from below the slabs of the three buildings at the Site (A, B, and C) at 17 out of 18 sampling locations, *i.e.*, in 94% of locations sampled (Anchor QEA, 2016; Appendix C);
- **Former fuel oil underground storage tank (UST, AOC A):** Mercury-affected soils requiring remediation were identified in an area of approximately 100 m^2 (up to 8 ft-bgs) in the Remedial Investigation (Amec, 2015). During soil excavation, the area of mercury- affected soils was found to be larger in spatial extent than previously believed and additional soils were excavated and removed by Amec (Amec, 2016).
- **Former TCE UST (AOC C):** Mercury was found at a concentration exceeding the NJDEP impact to groundwater standard in excavated soils from this area (to address TCE contamination), when the stockpiled material was tested for waste classification and disposal purposes.[1] Follow-up sampling is needed to fully define the extent of mercury soil contamination in this area.
- **Former Transformer Area (AOC J1)**: Mercury was found at a concentration exceeding the NJDEP impact to groundwater standard in excavated soils from this area (to address PCB contamination), when the stockpiled material was tested for waste classification and disposal purposes.[1] Follow-up sampling is needed to fully define the extent of mercury soil contamination in this area.
- **Catch Basin (CB-07) associated with Site's sewer system** (AOC-O) – Soils excavated at this catch basin (CB-07) to address TCE contamination, when characterized for disposal purposes, found mercury at concentrations exceeding the NJDEP impact to groundwater standard. Amec undertook some additional sampling in this area to delineate mercury contamination, but it is unclear whether the extent of mercury in this (CB-07) area has been fully defined. In addition, the extent of mercury contamination associated with the Site's sewer system, which is believed to have historically received process water discharges from the buildings, has not been defined.

Overall, the mercury characterization results in building materials and in environmental media (soil, indoor air, and outdoor air) clearly demonstrate that mercury from the buildings has been and continues to be discharged to the environment. In addition to demolition of the three buildings at the Site, as part of implementing a comprehensive remedy at the Site, additional response actions are needed to address other environmental media affected by mercury at the Site, including but not limited to soils underlying the buildings, soil/sediments within and associated with the Site's sewer system that historically received process discharges, and possibly groundwater.

Specific Comments

1. The BASR inappropriately strays from its objective of characterizing conditions at the three buildings into misleading speculation regarding source attribution. Furthermore, the report's discussion of the relative roles played by BRG and GE's activities within the buildings and their respective roles in mobilizing mercury is factually misleading and technically flawed.

The objectives of this investigation – as approved by US EPA – were to characterize the extent of mercury impacts with the buildings and assess whether the buildings could be reused, as discussed in Work Plan (Anchor QEA, 2018):

[1] Mercury characterization results for stockpiled soils are expected to be biased low since these measurements are reflective of well-mixed soils, and mercury concentrations in localized areas near the source of the contamination (*e.g.*, process drain discharges) are expected to be higher.

> "[T]o evaluate the potential presence and extent of mercury impacts to building materials and interior subsurface structures and associated piping/conduits within the Site buildings. The results of this investigation will be used to assess potential building reuse and/or demolition scenarios for each of the three buildings (Buildings A, B, and C) on Site."

However, Chapter 6 of the BASR regarding "Sources of Mercury Vapor at VO-Toys Site" prematurely ventures into unfounded speculation regarding sources and transport mechanisms of mercury within the buildings. In its attempt to advance its flawed theory of mercury fate and transport within the building, the BASR mischaracterizes the property redevelopment-related activities undertaken by BRG within the buildings and grossly overstates the impacts of such work on mercury levels in the buildings, while minimizing the activities undertaken by GE.

The BASR needs to be transparent and factually accurate about the activities undertaken by GE within the buildings. GE undertook extensive subsurface intrusion activities within the three buildings as part of investigating the Site, delineating the TCE plume, and starting to remediate the TCE groundwater plume that underlies the buildings. The activities undertaken by GE's consultants within the buildings included:

- Coring through the building floors in at least 18 locations to collect soil samples as part of the remedial investigation and follow-up studies (Anchor QEA, 2016, Appendix C);
- Installation of 133 injection points within the footprint of the three buildings to inject oxidant to remediate the underlying TCE groundwater plume;
    - A number of these injection boreholes were not properly grouted and sealed, and later found by GE's consultant (Anchor QEA, 2016) to be a source of mercury vapor influx into Building B (see, Gradient, 2018c, for a detailed discussion). The condition of boreholes and associated mercury in-flux at these locations was not defined in Buildings A and C (Anchor QEA, 2016).
- Removal of large sections of the wood floor and/or saw cutting of the concrete floor to aid in its removal for the installation of a soil vapor extraction (SVE) system and a soil vapor barrier to address TCE groundwater contamination (see, Gradient, 2018c, for a detailed discussion).

The BASR should provide a detailed description of these activities and clearly identify the work done by GE. For example, the BASR currently attributes actions taken by GE's consultants to "others": "floor sections that were removed to support remediation activities by <u>others</u>", pg. 25 [emphasis added]. This is simply a disingenuous effort to avoid acknowledging the extensive activities undertaken by GE. In addition, if the BASR is going to address source attribution, it needs to assess the impact of GE's activities in mobilizing mercury vapors within the buildings.

The BASR overstates the scope of BRG's redevelopment activities and incorrectly asserts that BRG's redevelopment activities caused the mercury vapor concentrations observed in the buildings. The redevelopment activities that BRG implemented were limited in nature and included: lead paint / asbestos abatement, the removal of overhead electrical lighting, fire suppression and steam-heated radiators and associated piping, selective removal of some interior office walls and dropped acoustical tile ceilings, removal of bathroom fixtures and partitions and the advancement (and subsequent back-filling) of a few (less than 10) small test pits for evaluating the geotechnical characteristics of building foundations (see, Gradient, 2018c). The scope of BRG's subgrade redevelopment activities, in particular the opening of test pits, are insignificant compared to the vast scope of the floor coring, cutting and removal activities undertaken by GE. In addition, the EPA study (US EPA, 2005) cited in the BASR does not support Anchor QEA's conclusion that BRG's redevelopment activities caused the mercury vapor concentrations observed in the buildings. Any mercury mobilization attributed to BRG's activities, such a lead paint abatement, are expected to have been short lived and not to have persisted for multiple years.

Finally, in order to evaluate mercury sources and transport mechanisms, a comprehensive characterization of environmental conditions at the Site, including an investigation of soil and groundwater quality underlying the building slabs, is needed. One of Gradient's comments on the Work Plan that was disregarded by GE and Anchor QEA was to expand the investigation objectives to include a characterization of the subsurface deposits (Gradient, 2018a). GE needs to conduct a comprehensive investigation before engaging in unsubstantiated speculation regarding sources and transport mechanisms of mercury at the Site.

2. The role of historical and existing piping in serving as conduits for contaminant migration needs to be investigated promptly as part of building demolition remedial design.

Some of the highest mercury MVA measurements were found at pipe openings in Buildings A and C.[2] For example, 3 out of 7 measurements on the third floor of Building A exceeded the upper-bound measurement range of the instrument (and were reported as 999 $\mu g/m^3$) were associated with pipes. The BASR relegates these data to the tables and does not discuss these measurements. These measurements are clear indications that the pipes contained mercury and raise a number of questions, such as:

- Where do the pipes go? Were they historically connected to drains and/or to the Site's combined sanitary and storm sewer system? These questions need to be investigated to fully understand Site conditions and the full extent of mercury contamination associated with historical discharges from the buildings into the environment.
- In some cases, pipes with elevated mercury vapors were found on the 1st floor (*e.g.* Building C); were these conduits for mercury discharges to the environment?

GE needs to undertake additional investigations to understand the significance of the elevated mercury vapor measurements recorded in the pipes.

3. The process-related subsurface structure assessment – a critical investigation element - was not implemented.

Task 5 of the Work Plan required assessing subsurface structures within the building footprint to identify and characterize (including sample collection for mercury analysis) former process-related infrastructure. However, this task was not implemented. The BASR states that "Access restrictions limited the assessment of subsurface structures in Building A and C. Access to the subsurface structures was limited due to confined space entry concerns, suspect ACMs, and the presence of building debris. Assessment activities of these structures was performed to the extent feasible from the floor surface." The reasons listed for not conducting the work were not insurmountable hurdles and could have be addressed with proper planning and preparation. GE's failure to undertake this work leaves a critical question about the extent of mercury in sub-surface structures, often an accumulation area for elemental mercury, unresolved.

4. The BASR does not provide adequate details to understand how samples were collected and certain conclusions were reached.

4a. The approach used for mercury concentration depth-profiling is unclear and the findings from this work are not discussed in the BASR. The report should present a clear discussion and sampling/boring logs, field observations, and photographs at each sampling location.

[2] See BASR, Tables 2-1 and 2-3 (Anchor QEA, 2019)

Task 4 in the Work Plan had specified that samples will be collected to "determine if the total mercury concentration decreases with increasing depth of building material." However, there is no discussion of the findings from depth profiling of building materials in the BASR. In addition, it is difficult for the reader to fully understand how samples were collected or what the results mean. For example, Table 5 below presents the sampling results from two depth-integrated samples collected from a location on the first floor of Building B (note, same X, Y coordinates).[3] The first sample appears to have been collected from 1 to 4 inches below the floor and is described as wood, whereas the next sample appears to have been collected from 1 to 7 inches below the floor and is characterized as cinder. The cinder appears to be underlying the wood; however, the report should clearly explain how discrete samples of these different stratified building materials were obtained. It is unclear if the sample matrix defined as cinder is truly cinder or a mixture of wood and cinder. In addition to clarify the sampling approach and nomenclature, the report should also include sampling/boring logs, field observations, photographs for each sampling location so that the reader can have a better understanding of the investigation process and the findings.

Table 5: Example of two depth integrated building materials sampling results presented in BASR

Location	Sample Type	Depth (inch)	Map ID	Grid	X Offset	Y Offset	Z Offset	Sample Matrix	Mercury Concentration (mg/kg)
Building B 1st Floor	Depth Integrated	1.0-4.0	D6-1409	D6	10.2	14	0	Wood	136
Building B 1st Floor	Depth Integrated	1.0-7.0	D6-1410	D6	10.2	14	0	Cinder	175

The report should also clearly explain the results and discuss their implications. For example,

- Do these results presented in Table 5 above mean that concentration in the cinder layer are higher than the overlying wood?
- What is present underneath the cinder layer?

In addition to discussing the depth-profiling results, the report should present the information requested above (*i.e.*, sample nomenclature, sampling/boring logs, field observations, photographs for each sampling location) so that other readers have the information necessary for undertaking their own analyses.

4b. It is unclear how the floor cross-sections depicted on Figures 3-11 and 5-9 of the BASR were developed, and whether they are a reliable representations of Site conditions.

The report needs to explain how many excavations were conducted and/or relied upon and their locations for the reader to understand the reliability and representativeness of these portrayals on Figures 3-11 and 5-9.

a. In addition, some floor cross-sections are presented in Figures 3-10, 4-7, and 5-7; the report needs to document where these cross-sections are located. Were any MVA measurements collected at various depths along the floor cross-sections? If not, why?

b. Was any vertical profiling done with an MVA to define Hg vapor concentrations within the floor? If not, why?

[3]A number of depth-integrated samples were collected during the study with sampling results tabulated in a manner similar to Table 5; the issues and questions presented here, as they relate to the results presented in Table 5, apply more broadly to all these samples and sampling results.

c. How did Anchor QEA reach the conclusion that Hg "appeared to be “trapped” between the original tar concrete layer and the newer concrete floor surface" at grid cell D11 on the first floor of Building B (pg. 45)? How does Anchor QEA know that the elemental mercury has not penetrated beyond the newer concrete floor?

As discussed above, the report should also include sampling/boring logs, field observations, photographs for each sampling location so that the reader can have a better understanding of the investigation process and the findings.

5. The basis for the conclusion presented in the BASR regarding specific operations that resulted in the presence of mercury in the buildings at the Site is unclear.

The BASR only discusses historical operations undertaken by RCA in Building A, but does not present any historical process related information for Buildings B and C or GE's operations at any of the buildings. GE operated at the Site for up to 30 years manufacturing light bulbs before RCA's operations commenced at the Site. It is unclear whether GE has any information about the specifics of its operations undertaken historically at the Site at any of the three buildings of interest.

6. The BASR does not explain how the data on the first floor of Building B were collected or what they mean, given the presence of the HDPE liner.

The first floor of Building B is currently covered by an HDPE liner that was installed by GE in mid-2016. Nonetheless, the BASR discusses the presence of visible mercury, MVA and XRF measurements, and results of TCLP and total mercury analyses for samples collected from this floor. It is not clear how these samples were collected. If the HDPE liner was removed for a limited time to collect samples, what was the procedure for removing and re-placing the liner? Were the reported MVA measurements collected before or after removing and replacing the liner?

7 The BASR does not present a substantial amount of building materials mercury characterization data previously obtained on the first floor of Building B. These data are relevant for meeting the study's objectives and should be included in this report to provide a full understanding of conditions at Building B.

GE's contractors previously developed a significant data set for defining mercury concentrations in building materials on the 1st floor of Building B. These data were presented in a prior Anchor QEA report (Anchor QEA, 2016), and should be integrated with the data generated as part of this investigation to provide a complete understanding of conditions within Building B.

Table 1: Mercury Vapor Survey Results Summary (AQEA, 2019)

	MVA Maximum Reading (µg/m^3)				
	Floors	**Walls**	**Columns**	**Windows**	**Beam and Ceiling**
Building A	>999	641	179	12	N/A
Building B	>999	264	>999	61	3
Building C	>999	>999	780	>999	160

Table 2: XRF Survey Results Summary (AQEA, 2019)

	XRF Maximum Reading (mg/kg)				
	Floors	**Walls**	**Columns**	**Windows**	**Beam and Ceiling**
Building A	2,490	5,242	581	71	N/A
Building B	2,870	730	365	51	N/A
Building C	7,544	298	212	1,148	471

Table 3: Total Mercury in Building Materials Summary (AQEA, 2019)

	Maximum Total Mercury (mg/kg)				
	Floors	**Walls**	**Columns**	**Windows**	**Roof**
Building A	1,800	464	128	0.768	7.76
Building B	2,880	583	54.7	59.2	1.94
Building C	10,800	139	929	220	N/A

Table 4: TCLP Mercury Summary: Building Materials (AQEA, 2019)

	TCLP (mg/L)				
	Floors	**Walls**	**Columns**	**Windows**	**Roof**
Building A	3.36	0.96	NA	NA	ND
Building B	2.76	0.05	N/A	N/A	0.0004
Building C	5.20	0.03	0.0005	0.04	N/A

References

Amec Foster Wheeler Environment & Infrastructure, Inc. 2015. "Onsite Remedial Investigation Report, Vo-Toys, 400 South Fifth Street, Harrison, Hudson County, New Jersey." Report to GE One EHS (King of Prussia, PA) Submitted to New Jersey Dept. of Environmental Protection (NJDEP) 182p. March 17.

Amec Foster Wheeler Environment & Infrastructure, Inc. 2016. "Draft Map Developed During Remedial Action Implementation." January.

Anchor QEA, LLC. 2016. "Mercury Data Summary Report, Vo-Toys Site." Report to General Electric Co. 343p. October.

Anchor QEA, LLC. 2018. "Building Assessment Work Plan, Vo Toys Site." Report to General Electric Co. 237p. March.

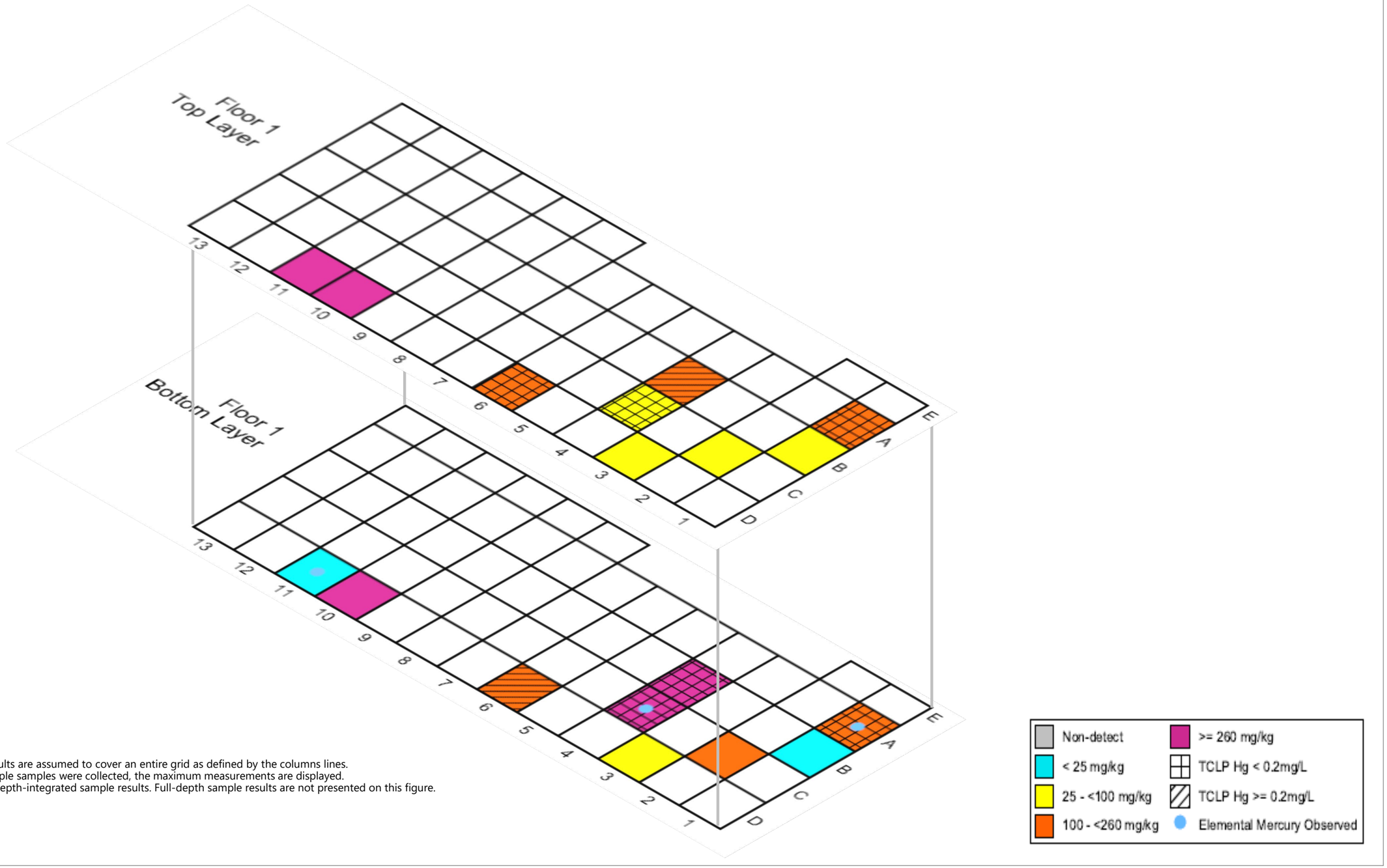
Anchor QEA, LLC. 2019. "Building Assessment Summary Report, Vo Toys Site." Report to General Electric Co. (Exton, PA) 501p. January.

Gradient. 2018a. "Comments on Anchor QEA's Building Assessment Work Plan, Vo Toys Site, Harrison, NJ." 3p. April 11.

Gradient. 2018b. "Letter to M. Pedersen (NJDEP) re: Former Edison Lampworks Facility (aka Vo-Toys Site), Harrison, New Jersey." 26p. December 21.

Gradient. 2018c. "Mercury Contamination at Former Vo-Toys Site, Harrison, NJ." Report to BRG Harrison Lofts Urban Renewal, LLC. Submitted to New Jersey Dept. of Environmental Protection (NJDEP) 13p. March 6.

US EPA, Office of Solid Waste and Emergency Response (OSWER); Singhvi, R. 2005. "Ritualistic Use of Mercury - Simulation: A Preliminary Investigation of Metallic Mercury Vapor Fate and Transport in a Trailer." Report to US EPA, Office of Superfund Remediation and Technology Innovation. EPA/540/-04/006; OSWER 9285.4-08. 146p. January.



Notes:
1. Analytical sample results are assumed to cover an entire grid as defined by the columns lines.
2. For grids where multiple samples were collected, the maximum measurements are displayed.
3. This figure presents depth-integrated sample results. Full-depth sample results are not presented on this figure.

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ANCHOR QEA

Figure 4-10
Building B First Floor- Total Mercury and TCLP Mercury Floor Results for Flooring System Layers
Vo-Toys Site Building Assessment Summary Report
General Electric Company